IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF SOUTH CAROLINA AIKEN DIVISION

MANAGEMENT CASE: C/A No. 1:06-mn-6000

In re:	Graniteville Cases)	C/A No. 1:05-0470-MBS
)	C/A No. 1:05-2817-MBS
)	C/A No. 1:05-3177-MBS

STIPULATION

It has been agreed among by the Plaintiffs' and Defendants' counsel that the Court should not consider the Norfolk Southern Motion for Partial Summary Judgment until it rules upon the pending motions for remand. This stipulation applies in the three cases of Sanders (C/A No. 1:05-0470-MBS); Avondale, Incorporated (C/A No 1:05-2917-MBS); and Avondale Mills, Incorporated and Avondale Mills Graniteville Fabrics, Incorporated, (C/A No. 1:05-3177-MBS), identified by civil action numbers above.

February 2, 2006

Respectfully submitted,

/s/ Terry E. Richardson
Terry E. Richardson, Jr. (#3457)
J. David Butler (#6206)
Walter McBrayer Wood (#9649)
Richardson, Patrick, Westbrook & Brickman
P. O. Box 1368

Barnwell, SC 29812

Attorney for Plaintiffs

IN THE UNTIED STATES DISTRICT COURT FOR THE DISTRICT OF SOUTH CAROLINA AIKEN DIVISION

MANAGEMENT CASE: C/A No. 1:06-mn-6000

I, Terry E. Richardson, Jr., attorney for Richardson, Patrick, Westbrook & Brickman, LLC, counsel for the Plaintiff, do hereby certify that I have this date electronically and/or mailed postage paid, a true copy of Stipulation to all counsel of record as follows:

W. Howard Boyd, Jr.
Ronald K. Wray II
Daniel B. White
Christopher M. Kelly
Gallivan, White & Boyd, P.A.
P.O. Box 10589
Greenville, SC 29603

Joe Hollingsworth, Esq. Spriggs & Hollingsworth 1350 I Street, NW – 9th Floor P.O. Box 11449 Washington, DC 20005 jhollingsworth@spriggs.com

Gray T. Culbreath, Esq. Collins & Lacy 1330 Lady Street P.O. Box 12487 Columbia, SC 29211 J. Arthur Davison, Esq. Fulcher Hagler, LLP 520 Greene Street Augusta, GA 30901

Monteith P. Todd, Esq. Sowell, Gray, Stepp & Laffitte 1310 Gadsden St. Columbia, SC 29211 February 2, 2006

/s/ Terry E. Richardson, Jr. Terry E. Richardson, Jr.